

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 08-04921 GAC

PIZARRO QUIÑONES, DAISY

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.  
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: \_\_\_\_\_

☒ AMENDED PLAN DATED: 10/28/2008

☐ PRE ☒ POST-CONFIRMATION

Filed by: ☒ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ 300.00 x 48 = \$ 14,400.00  
\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_  
\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_  
\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_  
\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_

TOTAL: \$ 14,400.00

Additional Payments:

\$ \_\_\_\_\_ to be paid as a LUMP SUM  
within \_\_\_\_\_ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in  
addition to the above:

\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ \_\_\_\_\_

PROPOSED BASE: \$ 14,400.00

III. ATTORNEY'S FEES  
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee  
Disclosure Statement: \$ 2,800.00

Additional fees: \$350.00

Adjusted Balance: \$3,150.00

Signed: Daisy Quiñones

Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR \$ \_\_\_\_\_

B. SECURED CLAIMS:

☒ Debtor represents no secured claims.

☐ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☐ Trustee pays secured ARREARS:

Cr. \_\_\_\_\_ Cr. \_\_\_\_\_ Cr. \_\_\_\_\_  
# \_\_\_\_\_ # \_\_\_\_\_ # \_\_\_\_\_  
\$ \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

2. ☐ Trustee pays IN FULL Secured Claims:

Cr. \_\_\_\_\_ Cr. \_\_\_\_\_ Cr. \_\_\_\_\_  
# \_\_\_\_\_ # \_\_\_\_\_ # \_\_\_\_\_  
\$ \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. \_\_\_\_\_ Cr. \_\_\_\_\_ Cr. \_\_\_\_\_  
# \_\_\_\_\_ # \_\_\_\_\_ # \_\_\_\_\_  
\$ \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☐ Debtor otherwise maintains regular payments directly to:

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.

11 U.S.C. § 507 and § 1322(a)(2) HACIENDA

D. UNSECURED CLAIMS: Plan ☒ Classifies ☐ Does not Classify Claims.

1. (a) Class A: ☒ Co-debtor Claims / ☐ Other:

☒ Paid 100% / ☐ Other:

Cr. BANCO POPULAR D Cr. \_\_\_\_\_ Cr. \_\_\_\_\_  
# 10100104719750101 # \_\_\_\_\_ # \_\_\_\_\_  
\$ 4,808.94 \$ \_\_\_\_\_ \$ \_\_\_\_\_

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)  
TRUSTEE TO PAY ATTORNEY'S FEES BEFORE ANY SECURED OR  
PRIORITY CREDITOR.

Attorney for Debtor Marilyn Valdes Ortega Law Offices

Phone: (787) 758-4400

AMENDED CHAPTER 13 PAYMENT PLAN

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF:

DAISY PIZARRO QUINONES

DEBTOR(S)

CASE NUMBER: 08-04921 GAC

CHAPTER 13 ( ASSET CASE)

DEBTOR'S MOTION UNDER SECTION 1329 OF THE BANKRUPTCY CODE

THE HONORABLE COURT:

COMES NOW, Debtor (s) through the undersigned attorney and respectfully ALLEGES and PRAYS:

1. That debtor (s) filed and circulated a MODIFIED PLAN to all parties in interest.

2. That the modification is based in that the Debtor (s) wants to amend their plan in order to:

a. To pay includes Treasury Department Priority debt.

3. Debtor (s) amend plan call for forty eight (48) payment of \$300.00 for a total base of \$14,400.00 dollars with a provision for the payment of co-debtor claim to Banco Popular de Puerto Rico and Priority debt to Treasury Department ( Hacienda).

4. Debtor (s) are still is interested in continuing with the bankruptcy procedures and proof if the amendment of the plan in order to comply with the disbursement schedules. To includes Priority debt to Treasury Department (Hacienda).

**WHEREFORE**, Debtor (s) respectfully request from this Honorable Court to accept this motion and grant debtor (s) the opportunity to modify the confirmed plan according to 11 US 1329 and provide any other remedy it may deem appropriate.

**NOTICE**

"Parties in interest are notified they have twenty (20) days to reject a proposed modification of a plan and request a hearing. If no opposition is filed within the prescribed period of time, the Court will enter an order granting the motion upon the filing of a certificate of service by the movant that adequate notice was given. Should an opposition be timely filed. The Court will schedule the motion for a hearing as a contested matter. Absent good cause, untimely rejections shall be denied".

In San Juan, Puerto Rico, this 27<sup>th</sup>, day of October, 2008.

**I HEREBY CERTIFY:** That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee **Alejandro Oliveras, Esq.**, US Trustee **Monsita Lecaroz Arribas** and to all those who in this case have registered for receipt of notice by electronic mail and I hereby certify that I have mailed by regular mail to all creditors listed on the attached Master Address List.

**RESPECTFULLY SUBMITTED.**

**/s/ Marilyn Valdes Ortega**

**MARILYN VALDES ORTEGA**

USDC PR 214711

P.O. Box 19559

San Juan, PR 00919-5596

Tel. (787) 758-4400

Fax. (787) 763-0144

E-mail valdeslaw@prtc.net

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE: \*  
DAISY PIZARRO QUINONES \* CASE NUMBER 08-04921 GAC  
\*  
Debtor(s) \* CHAPTER 13 (ASSET CASE)  
\*\*\*\*\*

NOTICE OF FILING AMENDED PLAN  
TO ALL THE CREDITORS LISTED ON THE ATTACHED  
MASTER ADDRESS LIST

NOTICE IS HEREBY GIVEN THAT DEBTOR (S) FILED THE  
ATTACHED PLAN ON October 28<sup>th</sup>, 2008

Parties in interest are hereby granted twenty (20) days from the date of notice to oppose the motion and request a hearing. If no opposition is filed within the prescribed period of time the Court will enter an order granting the motion upon the filing of a certificate by the movant that adequate notice was given. Should an opposition be timely filed, the Court will schedule the motion for a hearing as contested matter.

MARILYN VALDES ORTEGA  
USDC PR 214711  
P.O. BOX 195596  
SAN JUAN, PR 00919-5596  
Tel. (787) 758-4400  
Fax. (787) 763-0144

In San Juan, Puerto Rico, this 28<sup>th</sup>, day of October, 2008.

**I HEREBY CERTIFY:** That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee **Alejandro Oliveras Rivera, Esq.**, US Trustee **Monsita Lecaroz Arribas** and to all those who in this case have registered for receipt of notice by electronic mail and I hereby certify that I have mailed by regular mail to all creditors listed on the attached Master Address List.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega  
MARILYN VALDES ORTEGA  
USDC PR 214711  
P.O. Box 19559  
San Juan, PR 00919-5596  
Tel. (787) 758-4400  
Fax. (787) 763-0144  
E-mail valdeslaw@prtc.net

Label Matrix for local noticing  
0104-3  
Case 08-04921-GAC13  
District of Puerto Rico  
Old San Juan  
Tue Oct 28 11:41:56 AST 2008

SANTANDER FINANCIAL SERVICES D/B/A ISLAND FI  
C/O LIGIA RIVERA BUJOSA  
PO BOX 7011  
PONCE, PR 00732-7011

BANCO POPULAR DE PR  
PO BOX 366818  
SAN JUAN PUERTO RICO 00936-6818

CITIFINANCIAL  
PO BOX 499  
HANOVER, MD 21076-0499

DEPARTAMENTO DEL TRABAJO  
AVE. MUÑOZ RIVERA 505  
HATO REY, PR 00918-3352

ISLAND FINANCE  
130 EXP. MARTINEZ NADAL 103  
GUAYNABO, PR 00969

MONEY EXPRESS  
BANKRUPTCY DIVISION  
PO BOX 9146  
SAN JUAN PR 00908-0146

MARILYN VALDES ORTEGA  
VALDES-ORTEGA  
P O BOX 195596  
SAN JUAN, PR 00919-5596

BANCO POPULAR  
EDGAR A VEGA ESQ  
PO BOX 362708  
SAN JUAN, PR 00936-2708

US Bankruptcy Court District of P.R.  
U.S. Post Office and Courthouse Building  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

BANCO POPULAR DE PR  
PO BOX 71375  
SAN JUAN, PR 00936-8475

COMMOLOCO  
P.O. BOX 955  
CANOVANAS, PR 00729-0955

FEDERAL LITIGATION DEPT OF JUSTICE  
PO BOX 9020192  
SAN JUAN, PR 00902-0192

LVNV Funding LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

ALEJANDRO OLIVERAS RIVERA  
ALEJANDRO OLIVERAS, CHAPTER 13 TRUS  
PO BOX 9024062  
SAN JUAN, PR 00902-4062

MONSITA LECAROS ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901-1938

COOP A/C ORIENTAL  
PO BOX 876  
HUMACAO, PR 00792-0876

American General Finance  
PO Box 955  
Canovanas, PR 00729-0955

CENTENIAL DE PUERTO RICO  
PO BOX 71514  
SAN JUAN, PR 00936-8614

DEPARTAMENTO DE HACIENDA  
PO BOX 9024140  
OFICINA 424 B  
SAN JUAN, PR 00902-4140

HOME DEPOT CREDIT SERVICES  
PROCESSING CENTER  
DES MOINES, IA 50364-0500

MONEY EXPRESS  
2010 CALLE LOIZA  
SANTURCE, PR 00911-1742

DAISY PIZARRO QUINONES  
SUITE 135  
PO BOX 1980  
LOIZA, PR 00772-1980

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) COOP A/C ORIENTAL  
PO BOX 876  
HUMACAO, PR 00792-0876

(u) PIZARRO QUINONES, DAISY  
581-41-2993

(d) SANTANDER FINANCIAL SERVICES D/B/A ISLAND  
C/O LIGIA RIVERA BUJOSA  
PO BOX 7011  
PONCE PR 00732-7011

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